

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MICHIGAN STATE A. PHILIP RANDOLPH  
INSTITUTE, COMMON CAUSE, MARY LANSDOWN,  
ERIN COMARTIN, and DION WILLIAMS,

Plaintiffs,

No. 2:16-cv-11844  
Hon. Gershwin Drain

v.

RUTH JOHNSON, in her official  
capacity as Michigan Secretary of State,

Defendant.

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**PLAINTIFFS' MOTION FOR LEAVE TO  
FILE SECOND AMENDED COMPLAINT**

NOW COME Plaintiffs Michigan State A. Philip Randolph Institute, Common Cause, Mary Lansdown, Erin CoMartin and Dion Williams through their attorneys Goodman Acker, P.C. and Sachs Waldman, P.C. and move the court, pursuant to FRCP Rule 15(a)(2), for leave to file their Second Amended Complaint, attached hereto.

Concurrence of opposing counsel was sought and denied.

Respectfully submitted,

SACHS WALDMAN, P.C.

/s/ Mary Ellen Gurewitz

Mary Ellen Gurewitz (P25724)

2211 E. Jefferson Avenue

Detroit, MI 48207

(313) 965-3464

[megurewitz@sachswaldman.com](mailto:megurewitz@sachswaldman.com)

GOODMAN ACKER, P.C.

/s/ Mark Brewer

Mark Brewer (P35661)

17000 W. Ten Mile Road, 2<sup>nd</sup> Floor

Southfield, MI 48075

(248) 483-5000

[mbrewer@goodmanacker.com](mailto:mbrewer@goodmanacker.com)

Dated: November 14, 2016

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**BRIEF IN SUPPORT OF MOTION FOR LEAVE  
TO FILE SECOND AMENDED COMPLAINT**

This is the first substantive amendment to the complaint, and it is filed when a responsive pleading has not yet been filed. FRCP Rule 15(a)(2) states that, “The court should freely give leave when justice so requires.” Justice requires that leave be granted here.

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/s/ Mary Ellen Gurewitz

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the ECF system on this 14th day of November 2016, which will send notice of this filing to all registered parties via electronic transmission.

SACHS WALDMAN, P.C.

/s/ Mary Ellen Gurewitz

Mary Ellen Gurewitz (P25724)  
2211 East Jefferson Avenue, Suite 200  
Detroit, MI 48207  
(313) 496-9420  
[megurewitz@sachswaldman.com](mailto:megurewitz@sachswaldman.com)

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